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FILED IN UNITED STATES DISTRICT  
COURT, DISTRICT OF UTAH  
APR 22 2020  
BY D. MARK JONES, CLERK  
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IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH, CENTRAL DIVISION

SEALED

UNITED STATES OF AMERICA,

Plaintiff,

vs.

GREG LEE SHIPP,

Defendant.

2:20mj311PMW

FELONY COMPLAINT

MAGIS NO.

VIOS. COUNT 1, 18 U.S.C. §  
2113(a),(d), ARMED CREDIT  
UNION ROBBERY;  
COUNT 2, 18 U.S.C. § 924(c),  
USING, CARRYING AND  
BRANDISHING A FIREARM  
DURING AND IN RELATION TO A  
CRIME OF VIOLENCE.

COUNT 1

(Armed Credit Union Robbery)  
18 U.S.C. § 2113(a), (d)

On or about February 27, 2020, in the Central Division of the District of Utah,

**GREG LEE SHIPP,**

the defendant herein, by force, violence, and intimidation did take from the person and  
presence of others, employees of the Chartway Federal Credit Union, located at 4090

South 4800 West, West Valley City, Utah, U.S. Currency, belonging to and in the care, custody, control, management, and possession of the Chartway Federal Credit Union, a credit union whose deposits are and on the date of the robbery were then insured by the National Credit Union Administration Board (NCUAB); and in committing and attempting to commit the above-described offense, did assault and place in jeopardy the lives of others by the use of a dangerous weapon and device; all in violation of 18 U.S.C. § 2113(a), (d).

**COUNT 2**

(Using, Carrying and Brandishing a Firearm  
During and in Relation to a Crime of Violence)  
18 U.S.C. § 924(c)

On or about February 27, 2020, in the Central Division of the District of Utah,

**GREG LEE SHIPP,**

the defendant herein, during and in relation to a crime of violence, that is, the armed credit union robbery described in Count 1 of this Indictment, knowingly used, carried and brandished a firearm, that is, a 9mm High Point handgun; all in violation of 18 U.S.C. § 924(c).

**AFFIDAVIT IN SUPPORT OF COMPLAINT AND ARREST WARRANT**

I, Jeremiah W. Fowlke, being duly sworn on oath, state as follows:

1. I am an investigative or law enforcement officer of the United States within the meaning of Section 2510(7) of Title 18, United States Code, and am empowered by

law to conduct investigations of and to make arrests for offenses enumerated in Section 2516 of Title 18, United States Code. I am a Special Agent with the Federal Bureau of Investigation and have been since December of 2010. Since 2016, I have been assigned to the FBI's Violent Crime Task Force (VCTF) and I am tasked with investigating bank robberies, car jacking's, threats, and other violent crimes. As a Special Agent with the FBI, I have participated in hundreds of investigations involving bank robbery in violation of Title 18, United States Code, Section 2113(a), in addition to other extensive criminal investigations.

2. On February 27, 2020, the Salt Lake City Police Department and the FBI responded to the Chartway Federal Credit Union, located at 4090 South 4800 West, West Valley City, Utah, on a robbery that had just occurred. An individual, later identified as GREG LEE SHIPP (SHIPP), entered the credit union and approached the nearest of three tellers. He placed a handgun on the counter pointing at the teller and demanded all the money from the cash drawer. The teller complied but the defendant demanded more money from the back of the credit union. The teller said she had no more cash.

3. SHIPP moved to the second teller pushing a customer out of the way and demanded the same. The teller complied, and he again asked for more cash from the back. The teller indicated she could go to the back to obtain some more money. While she went to the back, SHIPP approached the third teller demanding money, each time he brandished his handgun. This teller complied. As the second teller returned with money

from the back of the credit union, she had pressed a panic button and grabbed tracker device, placing the tracker in the bundles of twenties that she gave the defendant. The total amount taken was \$16,817. The defendant fled the bank and escaped on a bicycle.

4. Officers arrived and were able to locate the tracker signal. As they followed the signal, they located an abandoned bicycle matching the description of the bicycle used by SHIPP. Officers followed the tracker to an apartment complex a short distance from the credit union. Officers were able to identify the specific apartment from which the tracker signal was emitting. Officers identified the apartment resident was GREG LEE SHIPP.

5. While gathered outside of SHIPP's apartment building, SHIPP exited his apartment and attempted to leave to meet a friend. Officers made contact with SHIPP and asked to speak with him. SHIPP allowed officers to enter his apartment and to let the look around while they questioned him about the credit union robbery. During this questioning, officers observed a \$2000 money band on his bathroom counter. It was decided to bring SHIPP to the West Valley Police Department for questioning and obtain a search warrant for his residence.

6. During questioning, SHIPP admitted that he had robbed the credit union. He indicated that he had used a High Point 9mm handgun he had just purchased for the robbery. SHIPP advised that he had hidden the gun and the money inside of his sofa.

During the execution of a search warrant, officers were able to locate the 9mm High Point handgun, and \$16,699 in the sofa.

7. SHIPP confessed to the robbery and indicated he had planned the robbery for some time. He admitted that he made notes in a journal regarding the planned robbery. The notes were located by police during the search warrant. SHIPP stated he needed the money to pay his mother for his rent. Officers also located the clothing he wore during the robbery.

8. Based on my training and experience, and the training and experience of other law enforcement officers with whom I have conducted investigations or had discussions, I believe there is probable cause to arrest GREG LEE SHIPP. Your affiant requests an arrest warrant for the person known as GREG LEE SHIPP.

Dated this \_\_\_\_\_ day of April 2020.

FOWLKE.JEREMIAH.F49M78K74  
2020.04.21 10:56:08 -06'00'

JEREMIAH W. FOWLKE  
Special Agent FBI

Subscribed and sworn to before me, this 22<sup>nd</sup> day of April 2020.



PAUL M. WARNER

United States Chief Magistrate Judge

APPROVED:

JOHN W. HUBER

United States Attorney

CARLOS ESQUEDA

Digitally signed by CARLOS ESQUEDA  
Date: 2020.04.21 11:19:12 -06'00'

CARLOS A. ESQUEDA

Assistant United States Attorney